Meyer Steel Drum, Inc.

3201 South Millard Avenue
Chicago, Illinois 60623

Best Management Plan for Manufacturing Operations

(incorporated by reference into Construction Permit 06030011)

Date: February 11, 2016
Revision No. : __
Revision Date: _____

Preface:

This Best Management Plan (Plan) pertains to manufacturing operations and reflects the good housekeeping (best management) practices to be followed at the Facility. This Plan is required by, and is incorporated by reference into Construction Permit 031600APY ("Permit"), and, in conjunction with operating the RTO reflects practices to reduce emissions of potentially odorous material from the Facility.

Amendment:

This Operating Program may be amended so that it remains current. Any revision to the Operating Program shall be submitted to the IEPA within 30 days of such amendment for its review.

Recordkeeping:

Meyer Steel Drum (Meyer) shall keep a copy of the current Plan, and the previous plan, as applicable, at the source at all times. Meyer will keep written records sufficient to demonstrate that the activities required by the Plan have been met.

Good Housekeeping (Best Management) Practices:

1. *Drum "Receiving" Procedure:*

Drums will be accepted pursuant to the facility's Drum Acceptance Policy. When transferring drums from trailers to be processed, trailer doors will be kept open only for the time necessary to accomplish the transfer; covers on Open Head drums remain in place during the transfer. Specifically, covers will be kept on the drums following inspection and prior to introduction into the Drum Furnace except for the removal of gaskets and synthetic bungs prior to introduction into the Drum Furnace. Covers with bungs which cannot be readily or safely removed will be set aside for separate processing. For Tight Head drums, following processing in the cutting room, cut drum head will remain on the drum as it is conveyed to the Drum Furnace. Meyer will maintain a room exhaust point in addition to the work station pickup point in the Drum Top Cutter Room that ducts to the Drum Furnace.

Certain chemicals can produce unique odors when processed. Accordingly, out of sensitivity to the concerns of the community, the drums that contain residuals of the

following materials, based on inspection of the drum label, will be rejected and returned to the supplier:

- N U-Dimethyaminoropropylamine
- Methyl Methacrylate
- Dimethyaminoproplamine
- Dimethyl-p-Touludine
- Methylaminoethanol
- Phenylnethydichorosilane
- Vinyltriacetoxysilane
- Aminoethylethanolamine
- Dimethyanline
- Triethyalamine

Additionally, any drum with a plastic insert shall be rejected. A list of the unacceptable drums shall be posted next to the drum receiving area. Employees will be trained on the list and are required to review drum labels and inspect for plastic inserts prior to beginning the drum intake process.

2. *Coating Storage and Pumping Room:*

The coating storage room practice is to maintain coating containers closed except when mixing or actively supplying coating operations and then to have the containers covered as practical while still allowing mixing and access to delivery system equipment. (For coating operations not supplied through the coating storage room feed system, point of use systems also have the containers covered as practical while still allowing mixing and access to delivery system equipment.)

3. *Coating Booths:*

Where booths use filter media, the filter media is changed after each day of active operation.

4. Spills/Cleanup:

Spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials will be promptly cleaned up. VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials will be conveyed from one location to another in closed containers or pipes. VOM emissions from cleaning of application, storage, mixing, and conveying equipment will be reduced by performing equipment cleaning without atomizing the cleaning solvent and all spent solvent is captured in closed containers.